

## REMARKS

This Response and Amendment addresses the issues raised by the Examiner in the Final Office Action mailed July 14, 2005. Initially, Applicants would like to thank the Examiner for the careful consideration given this case and for indicating the withdrawal of a variety of different rejections that were previously lodged by the Examiner. In view of the above amendments and following remarks, Applicants believe that all outstanding issues have been addressed and prompt allowance of all remaining claims is respectfully requested.

### Claim Rejection 112

The Examiner rejected Claim 1 for reciting the limitation “said translation information” without proper antecedent basis. Applicant has removed the word “said” from the phrase to overcome this rejection.

### Claim Rejection 103(a)

The Examiner rejected Claims 1 and 6-8 under 35 U.S.C. 103(a) as being unpatentable over by U.S. Patent No. 6,434,627 Millet (“Millet”) and further in view of Tsirtsis (“Network Address Translation – Protocol Translation (NAT-PT)”) (“Tsirtsis”). Applicants believe that the teachings of Millet, alone or in combination with Tsirtsis, do not anticipate or render obvious the current claims. Claims 2, 7 and 8 have been cancelled without prejudice to its reintroduction in this or a related prosecution in order to simplify the current outstanding issues.

Features of the present invention as defined in amended claims 1, 6 and 9-10 include a translator which has received an address query of another terminal from a mobile terminal, generates information of address correspondence and registers the address correspondence information in an address translation server. Thereafter, the address translation server transmits the address correspondence information to a translator of a moving destination of the mobile terminal (to a new translator associated with the mobile terminal after movement). The translator at the moving destination of the mobile terminal then translates an address at the destination of a packet transmitted from the mobile terminal after movement, based on the received address correspondence information. With these structural features, communications between the devices can continue even after the mobile has been moved while translating the protocol. In other words, the mobile terminal need not inquire about the address of the mobile terminal after it is moved – a significant advantage over the cited art.

These claimed features of the present invention, as amended, are not disclosed or suggested in any of the cited references. For example, Millet, at Fig. 7, appears to disclose address translation information, but the address to be translated is Source MAC or Source IP. Both are addresses of packet transmission *sources*, such that Millet's translator is different from Applicants' claimed translator for translating a *destination* address – a different problem entirely.

The other cited art, U.S. Patent No. 5,940,470 to Vaudreuil (Vaudreuil"), merely relates to address/phone number management of fixed telephones. Clearly, Vaudreuil contains no relevant teaching about the claimed address translation for mobile terminals as in the present invention.

In sum, Applicants' invention has been made to address a specific problem to be solved: in order to perform communications at the location of a mobile terminal after it has moved, it has traditionally been necessary to inquire about the address of a terminal to be communicated and generate translation information to the translator to cause shut-off of the communication. Clearly, Applicants' currently claimed invention addresses this problem, and none of the cited references specifically mentions, or inherently suggests any information that mentions or addresses this problem.

#### New Claims

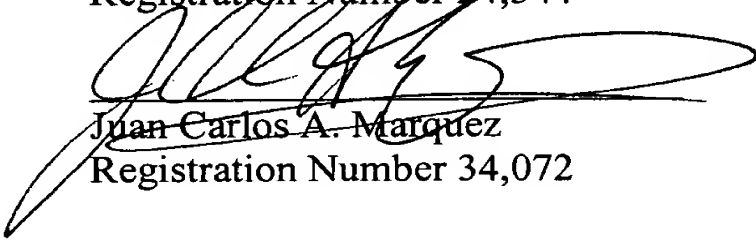
New Claims 9 and 10 have been added in order to more particularly point out the differences between the present invention and the cited prior art. They find support throughout the specification and specifically in the previously submitted Claims 1 and 6. They are simplified versions of these two claims.

Conclusion

The above claim amendments and accompanying remarks address each and every concern raised by the Examiner in the Office Action. Applicants believe that all remaining claims of the present invention are now in condition for final allowance. If the Examiner feels that any issues remain outstanding, the Examiner is encouraged to contact Applicants' attorney at the contact information below.

Respectfully submitted,

\_\_\_\_\_  
Stanley P. Fisher  
Registration Number 24,344

  
\_\_\_\_\_  
Juan Carlos A. Marquez  
Registration Number 34,072

\_\_\_\_\_  
Robert D. Kucler  
Registration No. 45,908

**REED SMITH LLP**  
3110 Fairview Park Drive  
Suite 1400  
Falls Church, Virginia 22042  
(703) 641-4200  
**December 2, 2005**